

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

INSILCO TECHNOLOGIES, INC., et al.,

Debtors.

Chapter 11

Case No. 02-13672 (KJC)

(Jointly Administered)

AMPHENOL CORPORATION and
AMPHENOL TECHNICAL PRODUCTS
INTERNATIONAL CO.,

Plaintiff,

v.

CHAD SHANDLER, AS TRUSTEE OF THE
INSILCO LIQUIDATING TRUST -
UNSECURED CREDITOR SERIES,

Defendant.

Adv. Proc. No. 05-52403

**DESIGNATION OF ADDITIONAL ITEMS FOR THE
RECORD ON APPEAL AND CLARIFICATION OF ISSUES PRESENTED
ON APPEAL BY APPELLEE CHAD SHANDLER, AS TRUSTEE OF
THE INSILCO LIQUIDATING TRUST- UNSECURED CREDITOR SERIES**

Chad Shandler, as Trustee of the Insilco Liquidating Trust - Unsecured Creditor Series (the “Appellee”), by his counsel Arent Fox PLLC and Drinker Biddle & Reath LLP, hereby submits the following designation of additional items for the record on appeal. The Appellee respectfully reserves the right to supplement and amend the record designations appearing herein.

Designation of Additional Items to be Included in the Record on Appeal

1. From the Chapter 11 Docket: In re Insilco Technologies, Inc., Ch. 11 Case No. 02-13672 (KJC)

<u>Docket Date</u>	<u>Docket No.</u>	<u>Title of Filing</u>
02/13/2004	1019	Amended Plan Filed by Insilco Technologies, Inc.
06/10/2004	1173	Findings of Fact and Conclusions of Law and Order Confirming the Amended Joint Liquidating Plan.
07/14/2004	1218	Transcript of Hearing on June 10, 2004.

Clarification of State of Issue Presented on Appeal

In the Statement of Issues on Appeal, the Appellants, Amphenol Corporation and Amphenol Technical Products International Co (together, “Amphenol” or the “Appellants”), state as their first Statement of Issues Presented on Appeal, “[w]hether the Bankruptcy Court erred in granting Defendant’s motion to dismiss on the merits in the Amphenol Adversary Proceeding wherein Amphenol sought a declaration that the Debtor and its successors and assigns released and waived any right to bring a preference action against its former wholly-owned subsidiary, Precision Cable de Mexico (“PCM”), under the terms of the Sale Agreement and Sale Order whereby the Debtors sold all shares of PCM to Amphenol in exchange for payments totaling \$1,176,582.10.” Appellee submits that may be a clerical error. As stated in Appellants’ Complaint for Declaratory and Injunctive Relief, the consideration paid for the shares of PCM was “approximately \$10,000,000.” The amount of \$1,176,582.10 represents the alleged preferential payment(s) set forth in the Complaint To Avoid And Recover Preferential

Transfers Of Property Pursuant To 11 U.S.C. § § 547 And 550 And To Disallow Claims
Pursuant to 11 U.S.C. § 502(d), filed by the Appellee.

Dated: October 16, 2006

DRINKER BIDDLE & REATH LLP

/s/ Howard Cohen

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